

Exhibit C

From: [Susan Rubenstein](#)
To: [Janette Wipper](#)
Cc: [Publicis](#)
Subject: FW: da silva moore
Date: Friday, December 07, 2012 10:39:28 AM

Susan Rubenstein
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From: Brecher, Jeffrey W. (Long Island) [mailto:BrecherJ@jacksonlewis.com]
Sent: Friday, December 07, 2012 10:25 AM
To: Susan Rubenstein; Deepika Bains; Siham Nurhussein
Cc: Chavey, Victoria Woodin (Hartford); Anders, Brett M. (Morristown); Evans, Paul C. (pevans@morganlewis.com)
Subject: da silva moore

Susan:

We do not believe our proposal is different than what Judge Peck contemplated or what we discussed. The proposal is aimed at streamlining discovery on the class issues, not the merits of any individual Title VII claim, as Judge Peck suggested. In light of Judge Peck's order that we submit a joint status report today, however, we suggest advising the Court the parties have conferred regarding how discovery should proceed, have agreed that it may be preferable not to

continue with the predictive coding at this time and to focus on class issues, but disagree regarding the scope of that discovery. We can advise the Court that the parties are continuing to confer to determine whether an agreement can be reached, discussions which will now include Publicis Groupe, given Judge Carter's recent decision, and the parties will be prepared to discuss the status of our discussions at the December 14, 2012 conference. We suggest an in-person meeting prior to that time to see if we can come up with a mutually agreeable discovery plan.

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